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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

MATTHEW RODRIGUEZ,

Defendant.

Case: 2:23-cr-20623

Assigned To : Grey, Jonathan J.C.

Referral Judge: Stafford, Elizabeth A.

Assign. Date : 11/2/2023

Description: IND USA V. RODRIGUEZ (DJ)

VIOLATIONS:

**18 U.S.C. § 242**

**(Deprivation of Rights  
Under Color of Law)**

**18 U.S.C. § 1519**

**(Falsification of Records)**

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**INDICTMENT**

THE GRAND JURY CHARGES:

**INTRODUCTION**

At all times relevant to this Indictment:

1. Defendant MATTHEW RODRIGUEZ was employed as a Police Officer for the Warren Police Department.
2. J.S. was a resident of Detroit, Michigan.

**COUNT ONE**

**(18 U.S.C. § 242 -Deprivation of Rights Under Color of Law)**

3. On or about June 13, 2023, in the Eastern District of Michigan, the defendant, MATTHEW RODRIGUEZ, while acting under color of law as a Police

Officer with the Warren Police Department, willfully deprived J.S. of the right, secured and protected by the Constitution and laws of the United States, to be free from unreasonable seizures, which includes the right to be free from the unreasonable use of force by a law enforcement officer. Specifically, MATTHEW RODRIGUEZ, without legal justification, repeatedly punched and struck J.S. in and about the head and face. The offense resulted in bodily injury to J.S.

4. All in violation of Title 18, United States Code, Section 242.

**COUNT TWO**  
**(18 U.S.C. § 1519 - Falsification of Records)**

5. On or about June 13, 2023, in the Eastern District of Michigan, the defendant, MATTHEW RODRIGUEZ, acting in relation to and in contemplation of a matter within the jurisdiction of the Federal Bureau of Investigation, an agency of the United States, knowingly falsified a record and document, with the intent to impede, obstruct, and influence the investigation and proper administration of that matter. Specifically, MATTHEW RODRIGUEZ wrote a narrative report as part of a Warren Police Department “Blue Team” use-of-force report regarding his use of force against J.S. that he knew to be false, in that it represented that MATTHEW RODRIGUEZ had struck J.S. only one time in the head, when in fact, as MATTHEW RODRIGUEZ then knew, he had struck J.S. multiple times, and had thrust J.S.’s head and face into a solid wall and into a solid floor.

6. All in violation of Title 18 United States Code, Section 1519.

A TRUE BILL:

s/ Grand Jury Foreperson

GRAND JURY FOREPERSON

DAWN N. ISON  
United States Attorney

KRISTEN CLARKE  
Assistant Attorney General  
Civil Rights Division  
U.S. Department of Justice

By:

s/ Robert A. Moran

Robert A. Moran  
Assistant United States Attorney

s/ Alec C. Ward

Alec C. Ward  
Trial Attorney  
United States Department of Justice  
Civil Rights Division, Criminal Section

Dated: November 2, 2023

United States District Court  
Eastern District of Michigan

**Criminal Case Cov**

Case: 2:23-cr-20623

Assigned To : Grey, Jonathan J.C.

Referral Judge: Stafford, Elizabeth A.

Assign. Date : 11/2/2023

Description: IND USA V. RODRIGUEZ (DJ)

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to comp

<b>Companion Case Information</b>	<b>Companion Case Number:</b>
This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :	<b>Judge Assigned:</b>
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<b>AUSA's Initials:</b> <i>Cor</i>

**Case Title:** USA v. Matthew Rodriguez

**County where offense occurred :** Macomb County

**Check One:** ☒ **Felony** ☐ **Misdemeanor** ☐ **Petty**

☐ Indictment/ ☐ Information --- no prior complaint.

☒ Indictment/ ☐ Information --- based upon prior complaint [Case number: 23-mj-30285

☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

**Superseding Case Information**

**Superseding to Case No:** \_\_\_\_\_ **Judge:** \_\_\_\_\_

☐ Corrects errors; no additional charges or defendants.

☐ Involves, for plea purposes, different charges or adds counts.

☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name

Charges

Prior Complaint (if applicable)

**Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.**

November 2, 2023

Date



Robert Moran  
Assistant United States Attorney  
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Attorney Bar #: P46346

<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.